

OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

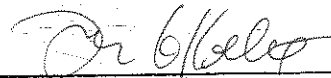
dosborn@osbornlawpc.com
ltrust@osbornlawpc.com

March 15, 2023

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

APPLICATION GRANTED
SO ORDERED



John G. Koeltl, U.S.D.J.

3/15/23

Re: *Arch v. Commissioner of Social Security*,
Civil Action No. 1:22-cv-08826-JGK

Dear Judge Koeltl,

We write on behalf of plaintiff, Nicole Arch, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on March 24, 2023. Plaintiff respectfully requests an extension of time up to and including May 24, 2023. This is plaintiff's first request for an extension.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- Plaintiff to file her motion for judgment on the pleadings on or before: **May 24, 2023**;
- Defendant to file its response to plaintiff's motion/cross motion on or before: **August 22, 2023**; and
- Plaintiff to file her reply, if any, on or before: **September 12, 2023**.

Honorable John G. Koeltl
March 15, 2023
Page 2

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Heetano Shamsoundar, Esq. (by ECF)